

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

DOROTHY K. MARTIN,

Plaintiff

vs.

**AVANT PUBLICATIONS, LLC d/b/a
TIMES LEADER d/b/a TIMES
LEADER MEDIA GROUP,**

Defendant

CIVIL ACTION

JURY TRIAL DEMANDED

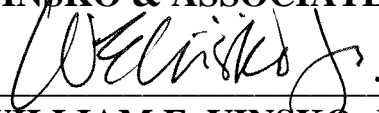
**THE HONORABLE
ROBERT D. MARIANI, JUDGE**

NO.: 3:22-CV-00276

DEFENDANT’S MOTION TO DISMISS COMPLAINT

The Defendant, **AVANT PUBLICATIONS, LLC, d/b/a TIMES LEADER d/b/a TIMES LEADER MEDIA GROUP**, by and through its legal counsel, pursuant to Federal Rule of Civil Procedure 12(b)(6), hereby files this Motion to Dismiss the Complaint in the above-captioned matter. The grounds for dismissal will be fully outlined and explained in a Memorandum of Law in support of this Motion. The Defendant requests oral argument on the Motion to Dismiss.

Respectfully submitted,
VINSKO & ASSOCIATES, P.C.



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AVANT PUBLICATIONS, LLC et. al.

Dated: **APRIL 25, 2022**